

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL DOCKET NO. 2:15-cr-00570
	:	
STEPHEN JEMAL	:	HONORABLE JOHN R. PADOVA

MOTION TO CONTINUE

AND NOW, Defendant Stephen Jemal, by and through counsel, Jack McMahon, Esquire, hereby submits this Motion to Continue and avers the following:

1. The above captioned case is currently scheduled for a hearing on the Defendant's Motion to Withdraw Guilty Plea, Friday, February 9, 2018 in Philadelphia, Pennsylvania.
2. Defense Counsel is currently on a six-week jury trial in Allentown, Pennsylvania, which began January 16, 2018, USA v. Edwin Pawlowski, before Judge Juan Sanchez.
3. On February 9, 2018, Defense Counsel will be in Allentown for witness preparation and meetings regarding the upcoming defense of the Pawlowski matter. Also, being on trial in Allentown, Defense Counsel has not had and will not have the time necessary to meet with and prepare witnesses needed for Defendant's hearing on the Motion to Withdraw Guilty Plea.
4. Assistant United States Attorney Joel Goldstein has no objections to this request to continue.
5. Defense Counsel respectfully requests that the above captioned matter be scheduled after the conclusion of the Pawlowski trial.

WHEREFORE, Defendant respectfully requests a continuance in the above-captioned case.

Respectfully submitted,

Date: January 30, 2018

/s/ Jack McMahon
Jack McMahon
Attorney for Stephen Jemal

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date a copy of the foregoing Motion to Continue was served by the Court's electronic case filing system upon the following:

Joel D. Goldstein, AUSA
Office of the United States Attorney
615 Chestnut Street
Suite 1250
Philadelphia, PA 19106

Date: January 30, 2018

/s/ Jack McMahon
Jack McMahon

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

v.

STEPHEN JEMAL

:

:

: CRIMINAL DOCKET NO. 2:15-cr-00570

:

: HONORABLE JOHN R. PADOVA

ORDER

It is hereby ORDERED and DECREED that Defense Motion to Continue in the above-captioned matter is hereby GRANTED.

J.